

EXHIBIT B

**Redacted Version of
Document Sought to
Be Sealed**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, MARIA NGUYEN,
WILLIAM BYATT, JEREMY DAVIS, and
CHRISTOPHER CASTILLO, individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**PLAINTIFF CHASOM BROWN'S OBJECTIONS AND RESPONSES
TO DEFENDANT'S FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Chasom Brown ("Brown") hereby objects and responds to Defendant's, Google LLC ("Google"), First Set of Interrogatories (Nos. 1–6). These objections and responses are made solely for the purpose of and in relation to this action. In addition, the objections and responses set forth in this document are based on Plaintiff Brown's knowledge, investigations, and analysis to date. As discovery proceeds, Plaintiff Brown may become aware of additional facts or evidence and his analysis of the case may change. Plaintiff Brown reserves all rights to supplement and amend his objections and responses accordingly.

INTERROGATORY NO. 1:

Describe with particularity each time YOU reviewed the GOOGLE TERMS OF SERVICE, GOOGLE PRIVACY POLICY, MY GOOGLE ACTIVITY, CHROME INCOGNITO NOTICE, CHROME TERMS OF SERVICE, and/or CHROME PRIVACY NOTICE prior to the filing of the COMPLAINT and, if YOU reviewed such documents, on what date(s) and which version(s) YOU reviewed, and whether YOU reviewed the entire document(s) or only portion(s) of the document(s) (if only portion(s), describe with particularity which portion(s) you reviewed).

1 reviewed or deleted data on MY GOOGLE ACTIVITY; and how often YOU enabled CHROME
2 INCOGNITO MODE while logged out of your Google account.

3 **RESPONSE TO INTERROGATORY NO. 2:**

4 Plaintiff Brown objects to Interrogatory No. 2 as overly broad, vague, and not proportional
5 to the needs of the litigation, considering Google requests each and every instance when Plaintiff
6 Brown used Chrome, the Google accounts logged into for each instance of using Chrome, each
7 website visited with Chrome, and other disproportional details, rendering this Interrogatory No. 2
8 not possible to fully and accurately answer. Plaintiff Brown also objects that this interrogatory is
9 compound, asking in part about his use of Chrome but then separately including a request regarding
10 the separate topic of whether he “reviewed or deleted data on MY GOOGLE ACTIVITY.” This
11 interrogatory therefore counts as two separate interrogatories.

12 Notwithstanding and subject to these objections, Plaintiff Brown responds that he has used
13 Chrome on his laptop computer since at least 2016 as the primary web browser. Since June 2016,
14 Plaintiff Brown used Chrome on his laptop, and in the last approximate two years began using
15 Chrome’s private browsing mode more often on his laptop, at least a few times per month, and at
16 least a few times per week on his Android phone. Plaintiff Brown uses private browsing mode on
17 both his laptop and phone to browse housing websites (e.g., Apartments.com); job websites; adult-
18 oriented websites; hotels and travel websites; and for shopping around holidays for himself and
19 others. To the best of Plaintiff Brown’s knowledge, he has never logged into any Google accounts
20 in Chrome when using Chrome’s private browsing mode, but may have logged into his Google
21 accounts, [REDACTED], [REDACTED] and [REDACTED], when
22 using Chrome in its non-private browsing mode. To the best of Plaintiff Brown’s knowledge,
23 Plaintiff Brown has not reviewed or deleted his My Google Activity.

24
25
26 **INTERROGATORY NO. 3:**
27
28

1 Describe with particularity how YOU have been harmed or damaged by DEFENDANT's
2 conduct alleged in YOUR COMPLAINT.

3 **RESPONSE TO INTERROGATORY NO. 3:**

4 Plaintiff Brown objects to Interrogatory No. 3 as discovery has not closed and Plaintiff
5 Brown does not know the full extent of Defendant's misconduct in collecting, gathering,
6 analyzing, and monetizing Plaintiff Brown's private browsing activity, and Plaintiff Brown
7 reserves his right to amend this interrogatory as the case proceeds.

8 Notwithstanding and subject to these objections, Plaintiff Brown responds that he values
9 his privacy and takes careful precautions to protect his privacy. When Plaintiff Brown engaged in
10 the private browsing mode in Google's Chrome browser, Plaintiff Brown read Google's
11 representations that Plaintiff Brown's browsing activity would not be collected and that he could
12 browse the web privately. Based on Google's representations, Plaintiff Brown reasonably believed
13 that he could control the information that would be shared with Google. Plaintiff Brown considered
14 this browsing activity private and confidential, and did not intend to share it with Google. Plaintiff
15 Brown never consented to Google's interception of his private browsing communication, Google's
16 collection of any data from his private browsing, or Google's use of any data from his private
17 browsing. Plaintiff Brown chose the private browsing mode to avoid Google's collection of that
18 browsing activity and to browse the web without Google spying on and gathering that browsing
19 activity for its own monetary gain. Without Plaintiff Brown's knowledge, Google continued to
20 monitor and collect his browsing activity and used that browsing activity for its own monetary
21 gain. Plaintiff Brown is familiar with other web browsers, such as Brave, among others, which pay
22 users a fee for their browsing.

23 **INTERROGATORY NO. 4:**

24 Without limitation as to time period, describe with particularity all websites, applications,
25 or other online services with which YOU voluntarily shared any DATA AT ISSUE.

26 **RESPONSE TO INTERROGATORY NO. 4:**
27
28

VERIFICATION

Under penalties of perjury, I declare that I have read the foregoing Answers to Interrogatories, and that the Answers are true and correct to the best of my knowledge and belief.

By: _____

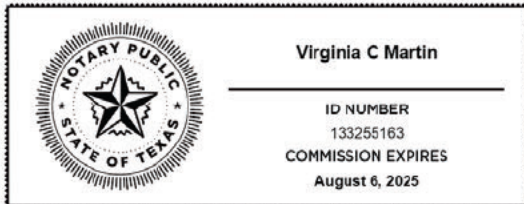
Printed Name: _____

Title: _____

STATE OF _____ Texas

COUNTY OF _____ Tarrant

The foregoing instrument was acknowledged before me this 2nd day of September, 2023, by Chasom Brown, who has produced as identification DRIVER LICENSE, bearing number B5816158, expiring 11/21/2027 and who did (did not) take an oath.



Virginia C. Martin
NOTARY PUBLIC SIGNATURE

Notarized online using audio-video communication

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, MARIA NGUYEN,
WILLIAM BYATT, JEREMY DAVIS, and
CHRISTOPHER CASTILLO, individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**PLAINTIFF WILLIAM BYATT'S OBJECTIONS AND RESPONSES
TO DEFENDANT'S FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff William Byatt ("Byatt") hereby objects and responds to Defendant's, Google LLC ("Google"), First Set of Interrogatories (Nos. 1–6). These objections and responses are made solely for the purpose of and in relation to this action. In addition, the objections and responses set forth in this document are based on Plaintiff Byatt's knowledge, investigations, and analysis to date. As discovery proceeds, Plaintiff Byatt may become aware of additional facts or evidence and his analysis of the case may change. Plaintiff Byatt reserves all rights to supplement and amend his objections and responses accordingly.

INTERROGATORY NO. 1:

Describe with particularity each time YOU reviewed the GOOGLE TERMS OF SERVICE, GOOGLE PRIVACY POLICY, MY GOOGLE ACTIVITY, CHROME INCOGNITO NOTICE, CHROME TERMS OF SERVICE, and/or CHROME PRIVACY NOTICE prior to the filing of the COMPLAINT and, if YOU reviewed such documents, on what date(s) and which version(s) YOU reviewed, and whether YOU reviewed the entire document(s) or only portion(s) of the document(s) (if only portion(s), describe with particularity which portion(s) you reviewed).

1 reviewed or deleted data on MY GOOGLE ACTIVITY; and how often YOU enabled CHROME
2 INCOGNITO MODE while logged out of your Google account.

3 **RESPONSE TO INTERROGATORY NO. 2:**

4 Plaintiff Byatt objects to Interrogatory No. 2 as overly broad, vague, and not proportional
5 to the needs of the litigation, considering Google requests each and every instance when Plaintiff
6 Byatt used Chrome, the Google accounts logged into for each instance of using Chrome, each
7 website visited with Chrome, and other disproportional details, rendering this Interrogatory No. 2
8 not possible to fully and accurately answer. Plaintiff Byatt also objects that this interrogatory is
9 compound, asking in part about his use of Chrome but then separately including a request regarding
10 the separate topic of whether he “reviewed or deleted data on MY GOOGLE ACTIVITY.” This
11 interrogatory therefore counts as two separate interrogatories.

12 Notwithstanding and subject to these objections, Plaintiff Byatt responds that he has used
13 Chrome since it was released. Since June 2016, Plaintiff Byatt has almost exclusively used Chrome
14 on his laptop computers, as well as on his Android phone. Since June 2016, Plaintiff Byatt
15 estimates that he uses the Chrome private browsing mode approximately one hour each day.
16 Plaintiff Byatt uses private browsing mode on both his laptop and phone. Plaintiff Byatt uses
17 private browsing mode on both his laptop and phone to browse news websites and adult-oriented
18 websites. To the best of Plaintiff Byatt’s knowledge, he has never logged into any Google accounts
19 in Chrome when using Chrome’s private browsing mode, but may have been logged into his
20 Google accounts, [REDACTED], [REDACTED], [REDACTED],
21 [REDACTED], and [REDACTED] when using
22 Chrome in its non-private browsing mode. Plaintiff Byatt has reviewed his My Google Activity
23 and, prior to this litigation, may have removed an entry from the My Google Activity, but cannot
24 recall what it was or when he did.

25 **INTERROGATORY NO. 3:**

26 Describe with particularity how YOU have been harmed or damaged by DEFENDANT’s
27 conduct alleged in YOUR COMPLAINT.
28

RESPONSE TO INTERROGATORY NO. 3:

Plaintiff Byatt objects to Interrogatory No. 3 as discovery has not closed and Plaintiff Byatt does not know the full extent of Defendant's misconduct in collecting, gathering, analyzing, and monetizing Plaintiff Byatt's private browsing activity, and Plaintiff Byatt reserves his right to amend this interrogatory as the case proceeds.

Notwithstanding and subject to these objections, Plaintiff Byatt responds that his privacy is very important to him and Plaintiff Byatt takes careful precautions to protect his privacy. When Plaintiff Byatt engaged in the private browsing mode in Google's Chrome browser, Plaintiff Byatt read Google's representations that Plaintiff Byatt's browsing activity would not be collected and that he could browse the web privately. Based on Google's representations, Plaintiff Byatt reasonably believed that he could control the information that would be shared with Google. Plaintiff Byatt considered this browsing activity private and confidential, and did intend to share it with Google. Plaintiff Byatt never consented to Google's interception of his private browsing communications, Google's collection of any data from his private browsing, or Google's use of any data from his private browsing. Plaintiff Byatt chose the private browsing mode to avoid Google's collection of that private browsing activity and to browse the web without Google spying on and gathering that browsing activity for its own monetary gain. Without Plaintiff Byatt's knowledge, Google continued to monitor and collect his browsing activity and used that browsing activity for its own monetary gain. Plaintiff Byatt is familiar with other web browsers, such as Brave, among others, which pay users a fee for their browsing.

INTERROGATORY NO. 4:

Without limitation as to time period, describe with particularity all websites, applications, or other online services with which YOU voluntarily shared any DATA AT ISSUE.

RESPONSE TO INTERROGATORY NO. 4:

Plaintiff Byatt objects to Interrogatory No. 4 as overly broad, vague, and not proportional to the needs of the litigation, considering Google requests each and every instance when Plaintiff Byatt may have shared "data" with a website, application, or other online service, regardless of

VERIFICATION

Under penalties of perjury, I declare that I have read the foregoing Answers to Interrogatories, and that the Answers are true and correct to the best of my knowledge and belief.

By: William Joshua Byatt

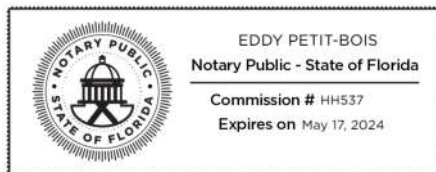
Printed Name: William Byatt

Title: N/A

STATE OF Florida

COUNTY OF palm beach

The foregoing instrument was acknowledged before me this 18th day of May, 2021, by William Joshua Byatt, who has produced as identification DRIVER LICENSE, bearing number B300930900841, expiring 03/04/2029 and who did (did not) take an oath.



Eddy Petit-Bois
NOTARY PUBLIC SIGNATURE
Notarized online using audio-video communication

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, MARIA NGUYEN,
WILLIAM BYATT, JEREMY DAVIS, and
CHRISTOPHER CASTILLO, individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**PLAINTIFF CHRISTOPHER CASTILLO'S OBJECTIONS AND RESPONSES
TO DEFENDANT'S FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Christopher Castillo ("Castillo") hereby objects and responds to Defendant's, Google LLC ("Google"), First Set of Interrogatories (Nos. 1–6). These objections and responses are made solely for the purpose of and in relation to this action. In addition, the objections and responses set forth in this document are based on Plaintiff Castillo's knowledge, investigations, and analysis to date. As discovery proceeds, Plaintiff Castillo may become aware of additional facts or evidence and his analysis of the case may change. Plaintiff Castillo reserves all rights to supplement and amend his objections and responses accordingly.

INTERROGATORY NO. 1:

Describe with particularity each time YOU reviewed the GOOGLE TERMS OF SERVICE, GOOGLE PRIVACY POLICY, MY GOOGLE ACTIVITY, CHROME INCOGNITO NOTICE, CHROME TERMS OF SERVICE, and/or CHROME PRIVACY NOTICE prior to the filing of the COMPLAINT and, if YOU reviewed such documents, on what date(s) and which version(s) YOU reviewed, and whether YOU reviewed the entire document(s) or only portion(s) of the document(s) (if only portion(s), describe with particularity which portion(s) you reviewed).

1 reviewed or deleted data on MY GOOGLE ACTIVITY; and how often YOU enabled CHROME
2 INCOGNITO MODE while logged out of your Google account.

3 **RESPONSE TO INTERROGATORY NO. 2:**

4 Plaintiff Castillo objects to Interrogatory No. 2 as overly broad, vague, and not proportional
5 to the needs of the litigation, considering Google requests each and every instance when Plaintiff
6 Castillo used Chrome, the Google accounts logged into for each instance of using Chrome, each
7 website visited with Chrome, and other disproportional details, rendering this Interrogatory No. 2
8 not possible to fully and accurately answer. Plaintiff Castillo also objects that this interrogatory is
9 compound, asking in part about his use of Chrome but then separately including a request regarding
10 the separate topic of whether he “reviewed or deleted data on MY GOOGLE ACTIVITY.” This
11 interrogatory therefore counts as two separate interrogatories.

12 Notwithstanding and subject to these objections, Plaintiff Castillo responds that he has used
13 Chrome on his desktop computers since at least 2016 as the primary web browser. Since June
14 2016, Plaintiff Castillo has used Chrome for most of his browsing activity on his devices, including
15 his desktop and Android phone. Since June 2016, Plaintiff Castillo has used Chrome in both the
16 non-private browsing mode and private browsing modes for his browsing activity on his devices,
17 including his desktop and Android phone. Since June 2016, Plaintiff Castillo estimates that he uses
18 the Chrome private browsing mode approximately two or three times per week. Plaintiff Castillo
19 uses private browsing mode on both his desktop and phone to browse dating websites, adult-
20 oriented websites, and shopping websites. To the best of Plaintiff Castillo’s knowledge, he has
21 never logged into any Google accounts in Chrome when using Chrome’s private browsing mode,
22 but may have been logged into his Google account, [REDACTED], when using
23 Chrome in its non-private browsing mode. To the best of Plaintiff Castillo’s knowledge, Plaintiff
24 Castillo has not reviewed or deleted his My Google Activity.

25 **INTERROGATORY NO. 3:**

26 Describe with particularity how YOU have been harmed or damaged by DEFENDANT’s
27 conduct alleged in YOUR COMPLAINT.
28

RESPONSE TO INTERROGATORY NO. 3:

Plaintiff Castillo objects to Interrogatory No. 3 as discovery has not closed and Plaintiff Castillo does not know the full extent of Defendant's misconduct in collecting, gathering, analyzing, and monetizing Plaintiff Castillo's private browsing activity, and Plaintiff Castillo reserves his right to amend this interrogatory as the case proceeds.

Notwithstanding and subject to these objections, Plaintiff Castillo responds that his privacy is a right and, as a former FBI agent who pursued terrorists and other criminals, Plaintiff Castillo values and takes meticulous precautions to protect his privacy. When Plaintiff Castillo engaged in the private browsing mode in Google's Chrome browser, Plaintiff Castillo read Google's representations that Plaintiff Castillo's browsing activity would not be collected and that he could browse the web privately. Based on Google's representations, Plaintiff Castillo reasonably believed that he could control the information that would be shared with Google. Plaintiff Castillo considered this browsing activity private and confidential, and did intend to share it with Google. Plaintiff Castillo never consented to Google's interception of his private browsing communications, Google's collection of any data from his private browsing, or Google's use of any data from his private browsing. Plaintiff Castillo chose the private browsing mode to avoid Google's collection of that private browsing activity and to browse the web without Google spying on and gathering that browsing activity for its own monetary gain. Without Plaintiff Castillo's knowledge, Google continued to monitor and collect his browsing activity and used that browsing activity for its own monetary gain. Plaintiff Castillo is familiar with other web browsers, such as Brave, among others, which pay users a fee for their browsing.

INTERROGATORY NO. 4:

Without limitation as to time period, describe with particularity all websites, applications, or other online services with which YOU voluntarily shared any DATA AT ISSUE.

RESPONSE TO INTERROGATORY NO. 4:

Plaintiff Castillo objects to Interrogatory No. 4 as overly broad, vague, and not proportional to the needs of the litigation, considering Google requests each and every instance when Plaintiff

VERIFICATION

Under penalties of perjury, I declare that I have read the foregoing Answers to Interrogatories, and that the Answers are true and correct to the best of my knowledge and belief.

By: Christopher Edmund Castillo

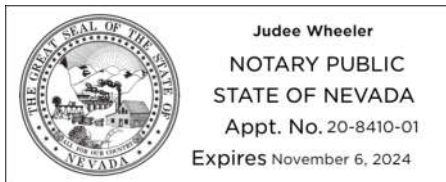
Printed Name: Christopher Castillo

Title: _____

STATE OF Nevada

COUNTY OF Clark

The foregoing instrument was acknowledged before me this 15th day of May, 2021, by Christopher Edmund Castillo, who has produced as identification Driver License, bearing number C5251076, expiring 04/21/2025 and who did (~~did not~~) take an oath.



Judee Wheeler

NOTARY PUBLIC SIGNATURE

Notarized online using audio-video communication

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, MARIA NGUYEN,
WILLIAM BYATT, JEREMY DAVIS, and
CHRISTOPHER CASTILLO, individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**PLAINTIFF JEREMY DAVIS' OBJECTIONS AND RESPONSES
TO DEFENDANT'S FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Jeremy Davis ("Davis") hereby objects and responds to Defendant's, Google LLC ("Google"), First Set of Interrogatories (Nos. 1–6). These objections and responses are made solely for the purpose of and in relation to this action. In addition, the objections and responses set forth in this document are based on Plaintiff Davis' knowledge, investigations, and analysis to date. As discovery proceeds, Plaintiff Davis may become aware of additional facts or evidence and his analysis of the case may change. Plaintiff Davis reserves all rights to supplement and amend his objections and responses accordingly.

INTERROGATORY NO. 1:

Describe with particularity each time YOU reviewed the GOOGLE TERMS OF SERVICE, GOOGLE PRIVACY POLICY, MY GOOGLE ACTIVITY, CHROME INCOGNITO NOTICE, CHROME TERMS OF SERVICE, and/or CHROME PRIVACY NOTICE prior to the filing of the COMPLAINT and, if YOU reviewed such documents, on what date(s) and which version(s) YOU reviewed, and whether YOU reviewed the entire document(s) or only portion(s) of the document(s) (if only portion(s), describe with particularity which portion(s) you reviewed).

1 reviewed or deleted data on MY GOOGLE ACTIVITY; and how often YOU enabled CHROME
2 INCOGNITO MODE while logged out of your Google account.

3 **RESPONSE TO INTERROGATORY NO. 2:**

4 Plaintiff Davis objects to Interrogatory No. 2 as overly broad, vague, and not proportional
5 to the needs of the litigation, considering Google requests each and every instance when Plaintiff
6 Davis used Chrome, the Google accounts logged into for each instance of using Chrome, each
7 website visited with Chrome, and other disproportional details, rendering this Interrogatory No. 2
8 not possible to fully and accurately answer. Plaintiff Davis also objects that this interrogatory is
9 compound, asking in part about his use of Chrome but then separately including a request regarding
10 the separate topic of whether he “reviewed or deleted data on MY GOOGLE ACTIVITY.” This
11 interrogatory therefore counts as two separate interrogatories.

12 Notwithstanding and subject to these objections, Plaintiff Davis responds that he has used
13 Chrome on desktop and laptop computers since at least 2008. Since June 2016, Plaintiff Davis has
14 exclusively used Chrome on desktop and laptop computers, as well as tablets and his phone, and
15 the overwhelming majority of his browsing activity is done in private browsing mode in Chrome,
16 which is at least hundreds of thousands of visits to websites during this time. In fact, Plaintiff Davis
17 utilizes private browsing mode by default on all of his devices and web browsers (Chrome on his
18 laptops and tablets, Chrome and Safari on his iPhone), and to the best of Plaintiff Davis’
19 knowledge, the only time browsing activity may be done outside of private browsing mode is when
20 Plaintiff Davis clicks a hyperlink from an email and that hyperlink launches his browser in non-
21 private browsing mode on his iPhone. Otherwise, all of Plaintiff Davis’ browsing activity is
22 performed in private browsing mode. To the best of Plaintiff Davis’ knowledge, he has never
23 logged into any Google accounts when using Chrome’s private browsing mode. To the best of
24 Plaintiff Davis’ knowledge, Plaintiff Davis has not reviewed or deleted his My Google Activity.

25 **INTERROGATORY NO. 3:**

26 Describe with particularity how YOU have been harmed or damaged by DEFENDANT’s
27 conduct alleged in YOUR COMPLAINT.
28

RESPONSE TO INTERROGATORY NO. 3:

Plaintiff Davis objects to Interrogatory No. 3 as discovery has not closed and Plaintiff Davis does not know the full extent of Defendant's misconduct in collecting, gathering, analyzing, and monetizing Plaintiff Davis' private browsing activity, and Plaintiff Davis reserves his right to amend this interrogatory as the case proceeds.

Notwithstanding and subject to these objections, Plaintiff Davis responds that his privacy is a human right and Plaintiff Davis takes careful precautions to protect his privacy. When Plaintiff Davis engaged in the private browsing mode in Google's Chrome browser (essentially every time he browsed the internet), Plaintiff Davis read Google's representations that Plaintiff Davis' browsing activity would not be collected and that he could browse the web privately. Based on Google's representations, Plaintiff Davis reasonably believed that he could control the information that would be shared with Google. Plaintiff Davis considered this browsing activity private and confidential, and did not intend to share it with Google. Plaintiff Davis never consented to Google's interception of his private browsing communications, Google's collection of any data from his private browsing, or Google's use of any data from his private browsing. Plaintiff Davis chose the private browsing mode to avoid Google's collection of that browsing activity and to browse the web without Google spying on and gathering that browsing activity for its own monetary gain. Without Plaintiff Davis' knowledge, Google continued to monitor and collect his browsing activity and used that browsing activity for its own monetary gain. Plaintiff Davis is familiar with other web browsers, such as Brave, among others, which pay users a fee for their browsing.

INTERROGATORY NO. 4:

Without limitation as to time period, describe with particularity all websites, applications, or other online services with which YOU voluntarily shared any DATA AT ISSUE.

RESPONSE TO INTERROGATORY NO. 4:

Plaintiff Davis objects to Interrogatory No. 4 as overly broad, vague, and not proportional to the needs of the litigation, considering Google requests each and every instance when Plaintiff

VERIFICATION

Under penalties of perjury, I declare that I have read the foregoing Answers to Interrogatories, and that the Answers are true and correct to the best of my knowledge and belief.

By: Jeremy Hart Davis

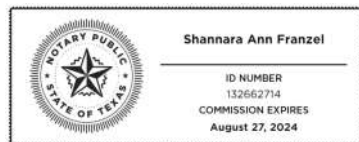
Printed Name: Jeremy Davis

Title: _____

STATE OF Texas

COUNTY OF Wise

The foregoing instrument was acknowledged before me this ____ day of 05/14/2021, 2021, by Jeremy Hart Davis, who has produced as identification Valid Driver's License, bearing number 902087090, expiring 08/23/2027 and who did (did not) take an oath.



132662714
Shannara Ann Franzel 08/27/2024
NOTARY PUBLIC SIGNATURE

Notarized online using audio-video communication

1
2
3
4
5
6
7
8
9
10
11

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all other
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-03664-LHK-SVK

12
13
14
15
16
17
18
19
20
21
22

**PLAINTIFF MONIQUE TRUJILLO'S OBJECTIONS AND RESPONSES
TO DEFENDANT'S FIRST AND SECOND SETS OF INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Monique Trujillo ("Trujillo") hereby objects and responds to Defendant's, Google LLC ("Google"), First and Second Sets of Interrogatories (Nos. 1–10). These objections and responses are made solely for the purpose of and in relation to this action. In addition, the objections and responses set forth in this document are based on Plaintiff Trujillo's knowledge, investigations, and analysis to date. As discovery proceeds, Plaintiff Trujillo may become aware of additional facts or evidence and her analysis of the case may change. Plaintiff Trujillo reserves all rights to supplement and amend her objections and responses accordingly.

INTERROGATORY NO. 1:

Describe with particularity each time YOU reviewed the GOOGLE TERMS OF SERVICE, GOOGLE PRIVACY POLICY, MY GOOGLE ACTIVITY, CHROME INCOGNITO NOTICE, CHROME TERMS OF SERVICE, and/or CHROME PRIVACY NOTICE prior to the filing of the COMPLAINT and, if YOU reviewed such documents, on what date(s) and which version(s) YOU reviewed, and whether YOU reviewed the entire document(s) or only portion(s) of the document(s) (if only portion(s), describe with particularity which portion(s) you reviewed).

23
24
25
26
27
28

1 now, she is only talking about what is going on during private browsing, on the browser application
2 itself, based on what she can actually observe in the ordinary course of her browsing.

3 **INTERROGATORY NO. 3:**

4 Describe with particularity how YOU have been harmed or damaged by DEFENDANT's
5 conduct alleged in YOUR COMPLAINT.

6 **RESPONSE TO INTERROGATORY NO. 3:**

7 Plaintiff Trujillo objects to Interrogatory No. 3 as discovery has not closed and Plaintiff
8 Trujillo does not know the full extent of Defendant's misrepresentations and deceptive conduct in
9 collecting, gathering, analyzing, and monetizing Plaintiff Trujillo's private browsing activity, and
10 Plaintiff Trujillo reserves her right to amend this interrogatory as the case proceeds.

11 Notwithstanding and subject to these objections, Plaintiff Trujillo responds that her privacy
12 is very important to her and Plaintiff Trujillo takes careful precautions to protect her privacy. When
13 Plaintiff Trujillo engaged in the private browsing mode in Google's Chrome browser, Plaintiff
14 Trujillo read Google's representations that Plaintiff Trujillo's browsing activity would not be
15 collected and that she could browse the web privately. Based on Google's representations, Plaintiff
16 Trujillo reasonably believed that she could control the information that would be shared with
17 Google. Plaintiff Trujillo considered this browsing activity private and confidential, and did not
18 intend to share it with Google. Plaintiff Trujillo never consented to Google's interception of her
19 private browsing communications, Google's collection of any data from her private browsing, or
20 Google's use of any data from her private browsing. Plaintiff Trujillo chose the private browsing
21 mode to avoid Google's collection of that browsing activity and to browse the web without Google
22 spying on and gathering that browsing activity for its own monetary gain. Without Plaintiff
23 Trujillo's knowledge, Google continued to monitor and collect her browsing activity and used that
24 browsing activity for its own monetary gain. Plaintiff Trujillo is familiar with other web browsers
25 that pay users a fee for their browsing.

26 **INTERROGATORY NO. 4:**

27

28

VERIFICATION

Under penalties of perjury, I declare that I have read the foregoing Answers to Interrogatories, and that the Answers are true and correct to the best of my knowledge and belief.

By: Monique Carolyn Trujillo

Printed Name: Monique Carolyn Trujillo

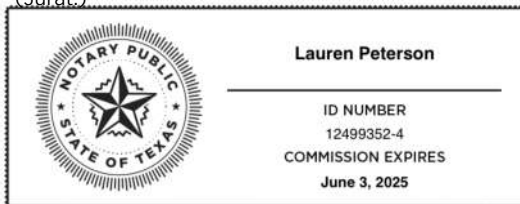
Title: N/A

STATE OF Texas

COUNTY OF Comal

The foregoing instrument was acknowledged before me this 17th day of November, 2021, by Monique Carolyn Trujillo, who has produced as identification California DRIVER LICENSE, bearing number B8914755, expiring 03/20/2022 and who did ☒ (did not) take an oath.

(Jurat:)



Lauren Peterson
NOTARY PUBLIC SIGNATURE

Lauren Peterson
Notary Public, State of Texas
Expiration: 06/03/2025

Notarized online using audio-video communication